

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EUCLIDES SOTO, LOUIS A. MARTINEZ,
JOSE RAMIREZ, CLEMENTE HERNANDEZ,
CESAR PIZARO, ELISON PENA,
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,
ANGEL BAEZ, ANTONIO MARTINEZ,
WILFREDO ORTIZ, EULOGIO ORTIZ,
MIRRAIN MIRANDA, RAFAEL MORENO,
NELSON ACEVEDO, and
RAMON RODRIQUEZ,

Plaintiffs,

v.

SHERMAN-FEINBERG CORPORATION,
FARNSWORTH FIBRE CORPORATION,
UNITED STEELWORKERS OF AMERICA,
LOCAL 421-U, and UNITED STEELWORKERS
OF AMERICA,

Defendants.

Civil Action No.
04-10892-JLT

**UNION DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY
TO PLAINTIFFS' OPPOSITION TO UNION'S MOTION TO STRIKE
PLAINTIFFS' SUPPLEMENTARY MOTION TO ATTACH**

Pursuant to Local Rule 7.1(B)(3), Defendants United Steelworkers, Local Union 421-U, and United Steelworkers, AFL-CIO/CLC (collectively, the Union), hereby seek leave to file a reply to Plaintiffs' Opposition to Union Defendants' Motion to Strike Plaintiffs' Supplementary Motion to Attach Assets. As grounds for this motion, the Union states that the plaintiffs have materially misstated the law in their opposition that the Union is seeking to correct through the filing of a reply.

WHEREFORE, the Union respectfully requests leave to file the accompanying
Reply to Plaintiffs' Opposition to Union Defendants' Motion to Strike Plaintiffs'
Supplementary Motion to Attach.

Respectfully submitted,

Dated: April 7, 2006

s/Alfred Gordon

Harold L. Lichten, BBO # 549689
Alfred Gordon, BBO # 630456
PYLE, ROME, LICHTEN, EHRENBURG
& LISS-RIORDAN, P.C.
18 Tremont St., Ste. 500
Boston, MA 02108
(617) 367-7200

Robert W. Alexander, Esq., *pro hac vice*
BREDHOFF & KAISER, P.L.L.C.
805 Fifteenth Street, N.W.
Washington, D.C. 20005-2207
(202) 842-2600

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served by electronic
filing on the attorneys of record for each party on April 7, 2006, and by U.S. Mail on
those who cannot receive electronic filings.

s/Alfred Gordon

Alfred Gordon